



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

December 20, 2024

**By ECF**

The Honorable Valerie Figueredo  
United States Magistrate Judge  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *New York Times Co. v. DOD*, 22 Civ. 10299 (GHW) (VF)

Dear Judge Figueredo:

The parties write respectfully to provide a status report in the above-named action brought under the Freedom of Information Act ("FOIA"). This action involves FOIA requests submitted by Charlie Savage, a reporter with The New York Times Company (collectively, the "Times"), to the U.S. Department of Defense ("DoD") and its component, the United States Special Operations Command ("SOCOM"). The FOIA requests to DoD have been resolved.

With regard to the FOIA request to SOCOM, the parties have been meeting and conferring regarding the productions by DoD and SOCOM. As a result of those discussions, DoD is conducting a limited supplemental search for additional potentially responsive records. The parties also continue to meet and confer concerning certain redactions, in an effort to narrow or eliminate any issues requiring litigation. To allow these discussions to continue, the parties respectfully propose to submit a further status report on or before February 18, 2025.

We thank the Court for its consideration of this submission.

**MEMO ENDORSED**

  
**HON. VALERIE FIGUEREDO**  
**UNITED STATES MAGISTRATE JUDGE**

Dated: 12/30/24

The parties are directed to submit a joint status update by **February 18, 2025**.

Respectfully submitted,

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